Remarks

Reconsideration of this Application is respectfully requested.

Upon entry of the foregoing amendment, claims 1-24 are pending in the application, with claim 1 being the independent claim. Claim 1 is sought to be amended. These changes are believed to introduce no new matter, and their entry is respectfully requested.

Based on the above amendment and the following remarks, Applicants respectfully request that the Examiner reconsider all outstanding objections and rejections and that they be withdrawn.

Rejections under 35 U.S.C. § 102

The Examiner has rejected claims 1, 3-11, and 16-24 under 35 U.S.C. § 102(e) as being anticipated by U.S. Patent No. 6,173,266 to Marx et al. ("Marx"). For the reasons set forth below, Applicants submit that Marx does not disclose each and every element and/or feature of Applicants' claims, and thus does not anticipate claims 1, 3-11, and 16-24. Accordingly, Applicants respectfully traverse.

First, Applicants seek to amend independent claim 1. Although Applicants respectfully disagree with the Examiner's rejection, the Examiner's rejection of claim 1 is moot in light of the current Amendment.

Claim 1 as amended defines an available set of generic dialog assets which are invoked from a repository. The available generic dialog assets in the repository include two or more of script generic dialog assets, prompt generic dialog assets, audio file generic dialog assets, grammar generic dialog assets, and prompt pool generic dialog

assets. The referenced generic dialog assets are described in the specification of the

present application as follows:

> Some of these common dialog assets include scripts, prompts, audio files, grammars, and prompt pools. The scripts are re-usable generic scripts that can be used to generate the specific voice application 27 during the voice coding phase 204 of the design methodology. Prompts are scripted, reusable prompts that can be used at any point within the dialog flow of the specific application 27. The audio files are voice files, such at .WAV files, that are used to interact with the caller. Grammars are ASR grammars that are used as the rule base for recognizing utterances spoken by the user. (Specification, page 11).

The Examiner compares the generic dialog assets of the present invention to the

"dialogue modules" and "dialog module templates" of Marx. Dialogue modules in Marx

include "computer readable instructions for accomplishing a predefined interactive

dialogue task in an interactive speech application." *See* Marx, col. 3, ll. 30-33. Dialogue

module templates in Marx are "predefined software modules", an instance of which is a

"dialogue module." *See* Marx, col. 8, ll. 42-51. Furthermore, dialogue modules

"perform a discrete task and save [their] results, including a value indicating its

termination condition." *See* Marx, col. 8, ll. 25-27.

With regards to the present invention, "audio file generic dialog assets",

"grammar generic dialog assets", and "prompt pool generic dialog assets" do not perform

a discrete task and save their results as dialogue modules do in Marx. These three

common dialog assets are simple information passed to the application for processing,

and are furthermore not "computer readable instructions." Furthermore, the "script

generic dialog assets" and "prompt generic dialog assets" of the present invention do not

operate by "performing a discrete task and saving their results" but are rather invoked by

the application itself. (Specification, page 15).

Furthermore, Marx nowhere teaches or suggests the use of a repository in a development environment that corresponds to a repository in a deployment environment, as recited by claim 1. The Examiner makes reference to Marx col. 6, ll. 14-22 and col. 17, ll. 7-34, but Marx nowhere teaches or suggests the use of a separate development and deployment environment with a common repository.

Since Marx does not teach or suggest each and every feature of independent claim 1, Marx cannot anticipate that claim. Applicants submit that dependent claims 3-11 and 16-24 are also not anticipated by Marx for at least the same reasons as independent claim 1 from which they depend, and further in view of their own respective features. Accordingly, the Examiner's rejection of claims 1, 3-11 and 16-24 under 35 U.S.C. § 102(e) is traversed and Applicants respectfully request that the rejection be withdrawn.

Rejections under 35 U.S.C. § 103

The Examiner has rejected claims 2 and 12-15 under 35 U.S.C. § 103(a) as being obvious over Marx in view of U.S. Patent No. 5,915,001 to Uppaluru ("Uppaluru"). Claims 2 and 12-15 depend from independent claim 1 and therefore include the recited set of generic dialog assets and the use of a repository in a development environment that corresponds to a repository in a deployment environment. As noted above with regard to claim 1, Marx does not teach or suggest these features. Uppaluru does not supply the missing teachings or suggestions. Since the combination of Marx and Uppaluru does not teach or suggest each and every feature of independent claim 1, this combination cannot render claim 1 obvious. Dependent claims 2 and 12-15 are likewise not rendered

obvious by the combination of Marx and Uppaluru for the same reasons as claim 1 from which they depend and further in view of their own respective features. Accordingly, the Examiner's rejection of claims 2 and 12-15 under 35 U.S.C. § 103(a) is traversed, and Applicants respectfully request that the rejection be withdrawn.
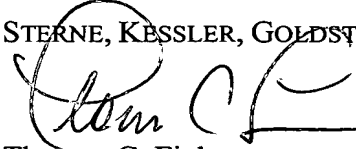
Conclusion

All of the stated grounds of objection and rejection have been properly traversed, accommodated, or rendered moot. Applicants therefore respectfully request that the Examiner reconsider all presently outstanding objections and rejections and that they be withdrawn. Applicants believe that a full and complete reply has been made to the outstanding Office Action and, as such, the present application is in condition for allowance. If the Examiner believes, for any reason, that personal communication will expedite prosecution of this application, the Examiner is invited to telephone the undersigned at the number provided.

Prompt and favorable consideration of this Amendment and Reply is respectfully requested.

Respectfully submitted,

STERNE, KESSLER, GOLDSTEIN & FOX P.L.L.C.

Thomas C. Fiala
Attorney for Applicants
Registration No. 43,610

Date: ___6/28/06___

1100 New York Avenue, N.W.
Washington, D.C. 20005-3934
(202) 371-2600

482621v1

Atty. Dkt. No. 2222.0820003